

our ref: Q70376  
your ref:  
email: daniel.rech@quod.com  
date: 28 March 2017



Planning Policy Team  
Council's Planning Offices,  
River Park House,  
Wood Green,  
N22 8HQ

Dear Sir / Madam

**WOOD GREEN AREA ACTION PLAN PREFERRED OPTIONS (2017) CONSULTATION**

**14 FEBRUARY 2017 TO 31 MARCH 2017**

**MECCA BINGO SITE, LORDSHIP LANE, LONDON, N22 5JY**

**REPRESENTATIONS ON BEHALF OF U + I PLC**

We are instructed by U + I Plc to submit representations to the Wood Green Area Action Plan (AAP) Preferred Options (AAP) Consultation Document out for comment from the 14 February 2017 to the 31 March 2017 to ensure that the interests of the company are maintained; to ensure that we can be party to further consultations; and to enable the future development capacity of the site to be realised.

As such we now submit representations to the proposed Wood Green AAP Preferred Options Document (2017) in accordance with the specified consultation timescale which terminates on Friday 31 March 2017. These representations are made with specific reference to the existing Mecca Bingo Site, Lordship Lane, albeit the wider approach to development within Wood Green is commented upon.

**a) Background – Mecca Bingo Site Context**

The site is located within the town centre boundary of Wood Green, fronting onto Lordship Lane (A109) and close to its junction with The Broadway/High Road (A105).

The existing site comprises the Mecca Bingo unit which forms a two storey building totalling approximately 3,606 square metres (GIA) and large surface level car park to the rear.

The site is approximately 1 mile south of the North Circular, 6 miles south-west of junction 25 of the M25 and 5 miles east of Junction 1 of the M1.

With regards to public transport, the site is located 200m east of Wood Green Underground station. Additionally there are multiple bus stops within close proximity of the site. The site has a PTAL score of 6a and is therefore considered to benefit from excellent public transport connectivity.

U + I have an aspiration to work with Haringey Council to re-develop the site and enable the future development capacity of the site to be realised.



**b) U + I Development Objectives**

U + I recognises the ambitions of Haringey Council, and wishes to work with the authority to deliver the recognised objectives for Wood Green identified in the AAP.

It is U + I's belief that Wood Green is the most appropriate location for growth as the borough's only Metropolitan Centre. U + I believe that significant capacity exists within this Central London location to accommodate levels of growth which exceed the minimum requirements to meet current and future requirements. Indeed this capacity exists, with or without, the introduction of Crossrail 2.

The below representations are structured as per the Preferred Option Consultation Draft:

**c) Development Plan Growth Requirements for Haringey and Wood Green**

The emerging Local Plan confirms Haringey's housing requirement of 19,802 homes over the plan period 2011-2026. The Council are promoting three Growth Areas (Haringey Heartlands/Wood Green; Tottenham Hale; and North Tottenham) and expect these to deliver a minimum 13,500 homes of this total and most of the business floorspace. Table 2 of Policy SP1 Managing Growth suggests a minimum requirement for 2,450 homes for Wood Green.

The London Plan requires a minimum Haringey delivery target of 15,020 homes for the 2015-2025 period (ten years) increasing the existing annual target from 820 homes to 1,502 homes per annum – an 83% increase.

To achieve this target Appendix 1 Housing Trajectory of the Local Plan Strategic Policies considers projected housing completions to be substantially greater in the future than Haringey have evidenced in the past (there is an existing delivery backlog of 8,364 homes in the borough). To achieve such ambitious targets Haringey must place a reliance on planning policy to deliver this growth objective. It is clear that Development Plan policy must evolve to enable Haringey to meet its minimum targets, to clear the existing backlog of housing delivery, and meet future needs. It is clear that a "Do Nothing" scenario will not meet this London Plan requirement, and planning to meet the "minimum" needs is not, in our opinion, a sustainable long term approach.

The London Plan 2015 also sets out revised employment projections for Haringey. The London Plan forecasts 12,000 additional jobs in the Borough of Haringey over the period 2011 – 2026. Over the period 2011 – 2036 it forecasts an additional 22,000 jobs in Haringey, the highest projected employment growth rate of all London boroughs.

**d) National Planning Framework (2012)**

The NPPF recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites.

In particular, Paragraph 173 states that:

**"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or**

**other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”**

It is therefore essential that the site is allocated for uses of sufficient value to ensure that the redevelopment of the site is viable.

**e) Introduction, Policy Content and Portrait**

We welcome Haringey’s aspiration to identify Wood Green as an Opportunity Area in the next iteration of the London Plan programmed for 2020.

We support the recognition that Lordship Lane “is a key arrival point by car, foot and bus from Tottenham and that “significant intensification potential exists on the Mecca Bingo Site”.

As identified within the SWOT analysis for Wood Green North on page 33, the significant amount of surface car parking being a weakness in the sub-area is also recognised given the large expanse at the rear of the Mecca Bingo Site.

**f) Key Issues, Challenges & Drivers**

U + I recognise the importance of town centre vitality and the Mecca Bingo site’s identification as an underutilised site which provides an opportunity to create additional town centre uses is supported.

**g) Spatial Development Strategy**

The Wood Green AAP Issues & Options document was consulted on between 8th February-20th March 2016. This set out four growth options for the centre, with housing capacities ranging from 4,600 to 6,000 new homes.

All of the identified growth Options presented by the Council require a step change in the approach to development within Wood Green and the document outlines the Council’s preferred option of ‘complete transformation’ (option 4) of the centre linked to a new Crossrail 2 station which as acknowledged within the preferred option consultation draft has support from the public, landowners and stakeholders in the area.

U + I seek to re-enforce this and support Option 4 as the only option which will deliver widespread and necessary change for Wood Green to help the existing backlog of housing and commercial needs, as well as those forecast to deliver social and economic change.

**h) AAP Area Wide Policies**

**i) Town Centre Uses, Boundaries & Frontages**

In relation to Wood Green North, point 2B of policy WG1: Town Centre Uses, Boundaries and Frontages seeks to allocate secondary frontages to encourage a mix of uses. Secondary frontages are then identified on Figure 7.4 (Changes to Secondary Frontages) on page 72:



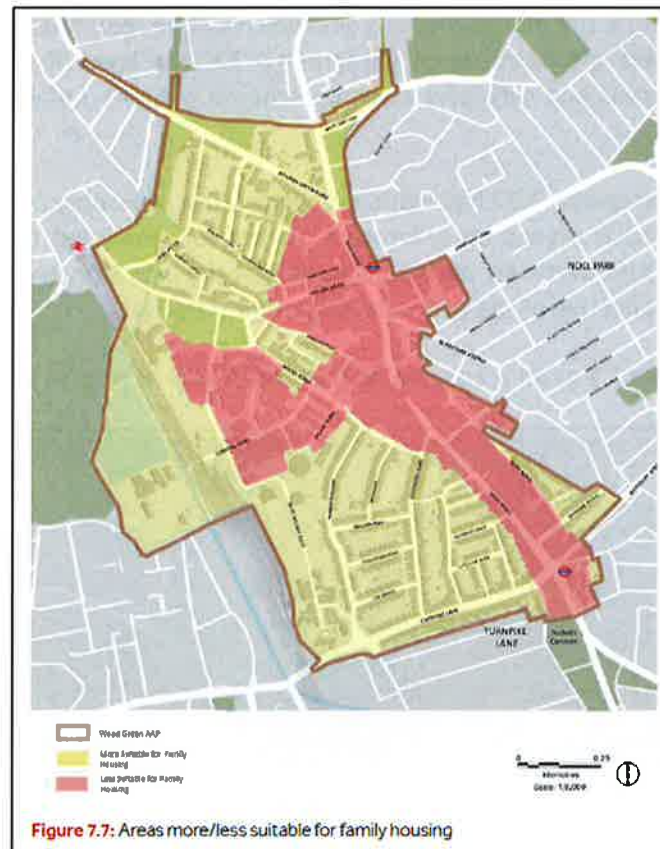
This is inconsistent with the site allocation WG SA 6 at page 116 which states a secondary frontage will be provided on the Lordship Lane ground floor frontage of this site.

We are supportive of the identification of Lordship Lane as a key arrival point and the importance of providing active frontage fronting Lordship Lane, however we suggest that site allocation WG SA 6 should remain flexible with regards to this provision at the site. We support a mix of uses at ground floor frontages but this should not be restricted to retail use given it is not currently provided at the site.

The active frontage to be provided should remain flexible with regards to use, with town centre uses being appropriate, as defined at Annex 2 of the NPPF.

ii) Housing

Policy WG2 Housing and Figure 7.7 Areas More/less Suitable for Family Housing identifies Mecca Bingo Site as being "less suitable for family housing".



This is strongly supported by U + I owing to the sites significant mixed-use re-development potential and in line with supporting text (para 7.21) which confirms that family housing should be located away from mixed use developments.

High densities will be necessary to bring the site forward and, as required by Policy WG2(2) : Housing “provide housing in accordance with the indicative minimum capacities set out in the Site Allocations within the AAP”.

We support policy text at point 2 of Policy WG2: Housing and supporting justification at paragraph 7.23 stating that all new development should be design led, and higher densities and capacities linked to good urban design and wider impact on other Local Plan priorities.

### iii) Economy

The step change in employment numbers and floorspace requirements between the 2016 Issues and Options AAP and the Regulation 18 AAP (2017) is unclear. The commercial floorspace requirements have increased from 1,500+ new jobs and 57,000m<sup>2</sup> of floorspace (Issues and Options AAP 2016) to 4,000 new jobs and 101,940m<sup>2</sup> (or 173,702m<sup>2</sup> employment + retail) floorspace. Paragraph 7.33 states that “modelling suggests that 80,000m<sup>2</sup> gross (of B-class floorspace) is required to meet the jobs target of 4,000”. This is clearly lower than the figure now being proposed.

Policy wording at Policy WG3: Economy states that in order to grow the office market in the AAP, new high quality office floorspace will be required in areas including Wood Green North. WG SA 6 (Mecca Bingo) is



identified within a list of several site allocations as a site which will be required to provide office floorspace. This wording does not reflect the flexibility of paragraph 7.37. The level of office floorspace should be reviewed on a site-by-site basis and reflective of other scheme benefits / viability and in line with NPPF Paragraph 173.

Supporting justification at paragraph 7.37 highlights the importance of flexible commercial floorspace which is supported. There is emphasis placed on a forecast market for small and medium size modern office floorspace targeted at SMEs and start-ups. We would argue that the provision/type of commercial floorspace should remain flexible and reflective of the wider development proposal.

The site is identified on Figure 7.8 as an area suitable for office/retail as re-provided below:



The mixed use redevelopment and inclusion of town centre uses at the site is supported. However, we would expect the primary use for the site to be residential and the level of commercial provision to remain flexible and non-prescriptive.

The distribution of such floorspace per site identified for each site allocation is explained in Appendix A, and is based upon a ratio of overall floorspace disaggregated into the three principal land use types (town centre, commercial and residential). By way of good practice, the AAP should define what is meant by “commercial” floorspace and “town centre uses” within the glossary, as at present there is unnecessary ambiguity.

**i) Site Allocation – WG SA 6 Mecca Bingo**

We welcome the allocation of the site for mixed use redevelopment. The opportunity and importance of the site's potential to provide an improved town centre frontage onto Lordship Lane is also recognised.

The development guidelines for the site suggest development should front onto Lordship Lane, with heights rising from east to west to match buildings on either side. This point is too prescriptive and restrictive on building heights for the site. As acknowledged by the document, the location is one of the main arrival points to the town centre, outside of any strategic views, and within 100m of the Crossrail 2 station. We would suggest that this location is suitable for a taller building which could act as marker for a new pedestrian route through the site and that building heights should not be restricted to matching the heights either side and rising from east-west.

The site offers scope for an architectural step from the sites either side of the development which will be required in order to support development capacities such as those identified within the indicative development capacity. There will need to be provision for increased variation in building heights within the site and therefore this wording should be removed.

The site allocation also states "the alignment of Wellesley Road will be extended, with townhouses provided on the southern side of the road. This will provide the servicing access for the site." This point is acknowledged, however the route of the culvert to the south of the site is currently unknown, and development may need to follow this.

**j) Other Issues**

**Chapter 3: Portrait of the Area, page 29** – The Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis for the AAP Area, suggests within the 'Threats' section, that without Crossrail the viability of schemes is undermined. We do not fully agree with this suggestion and believe Wood Green can achieve substantial growth with or without Crossrail.

**Chapter 3: Green Spaces and Waterways, page 18** – Paragraph 3.9 refers to the Moselle River. The paragraph does not however relate to Chapter 8 Site Allocations at which there are several site allocations which seek investigations for the Moselle's future use including WG SA 6 (Mecca Bingo). This is important as there should be a strategic approach to the River Moselle.

**Chapter 4: Key Issues Challenges and Drivers, Housing Need, page 49** – Paragraphs 4.24 – 4.28 fail to recognise that the housing targets proposed are the minimum requirements in order to meet housing need. The AAP should seek to maximise the delivery of housing numbers and not aim to just meet the minimum requirements.

**Community Infrastructure Levy (CIL)** – We believe that the AAP should contain a policy regarding the use and expenditure of CIL within the AAP area, and the appropriate use of s.106 legal obligations to ensure the betterment of Wood Green.

Please can you ensure that we remain on your data-base and are kept informed of the outcome of this consultation process and any future consultation proposals. We would also like to continue discussions with



Page 8

the Council regarding the content of these representations. Please can you confirm receipt of this letter via email to [Daniel.Rech@quod.com](mailto:Daniel.Rech@quod.com).

Yours faithfully

A handwritten signature in black ink that reads "D. Rech".

Daniel Rech  
Planner